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August 17, 2005

Robert Richardson
United States Attorney's Office
United States Courthouse, Suite 9200
1 Courthouse Way
Boston, MA 02210

RE: United States v. Cory Hubbard
Criminal No. 04-10235-MLW

Dear Mr. Richardson:

Pursuant to Local Rule 116.3(A) and Local Rule 116.9(A), I am requesting the following discovery:

1. To the extent possible, originals or photographic duplicates (rather than photocopies) of all photographs taken during the course of the investigation of the crimes set forth in the indictment, whether or not the government intends to introduce them into evidence at trial. If this request is not possible, then defendant requests an opportunity to view the originals and be provided with color photocopies of the same.
2. Any tape recordings of police communications regarding the controlled buy, execution of the search warrant and arrest of the defendant, regardless of whether the government intends to introduce them into evidence at trial.
3. All information regarding whether any law enforcement agent that participated in the investigation or trial of this case has been the subject of an investigation for disciplinary action or criminal investigation, any of which were for conduct involving false statements, perjury, obstruction of justice, receipt of gratuities or violation of rights of a criminal suspect or defendant. See United States v. Henthorn, 931 F.2d at

31.

4. Any information that tends to cast doubt or contradict the information set forth in the search warrant affidavit. See Local Rule 116.2 (B) (1) (b). Including in this request is any information that casts doubt on the reliability of the informant or of the information that he/she provided to the officer(s) pertaining to the defendant. Such information included but is not limited to the informant's use or abuse of drugs or alcohol, any promises, rewards or inducements given to the informant in exchange for information and the informant's criminal record, which includes charges that were pending at the time of the investigation of this case.
5. All notes, memoranda, statements, reports surveillance logs and other documents as set forth in Local Rule 116.9(A). See United States v. Diabate, 90 F.Supp.2d 140 (D.Mass.2000).

Upon the writing of this letter, defense is not in possession of any reciprocal discovery.

Upon receipt, please feel free to call me in order to discuss this further.

Sincerely,

Frank D. Camera

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cc: Clerk of Court
Cory Hubbard